

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, *et al.*

*Plaintiffs,*

v.

GREG ABBOTT, *et al.*,

*Defendants.*

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Case No. 3:21-cv-00259  
[Lead Case]

ROY CHARLES BROOKS, *et al.*

*Plaintiffs,*

v.

GREG ABBOTT, *et al.*,

*Defendants.*

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Case No. 1:21-cv-00988  
[Consolidated Case]

**DEFENDANTS' SECOND AMENDED EXHIBIT LIST**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Court's Scheduling Order of December 17, 2021, *see* ECF 97, Defendants provide the following second amended exhibit list for the hearing on the Brooks Plaintiffs' preliminary-injunction motion.

Number	Name	Offered	Admitted
1.	Partisan Shading Map with Racial and Ethnic Data		
2.	SD10 Partisan Shading Map – S2100		
3.	SD10 Partisan Shading Map – S2168		
4.	North Texas Partisan Shading Map – S2100		

Number	Name	Offered	Admitted
5.	SD10 Change in Partisan Population Map		
6.	Comparison of S2100 and S2168, Performance of SD10 in Statewide Elections – 2012 to 2020		
7.	Election Analysis – S2100 – 2012 General		
8.	Election Analysis – S2100 – 2014 General		
9.	Election Analysis – S2100 – 2016 General		
10.	Election Analysis – S2100 – 2018 General		
11.	Election Analysis – S2100 – 2020 General		
12.	Election Analysis – S2168 – 2012 General		
13.	Election Analysis – S2168 – 2014 General		
14.	Election Analysis – S2168 – 2016 General		
15.	Election Analysis – S2168 – 2018 General		
16.	Election Analysis – S2168 – 2020 General		
17.	SD10 Electoral History – 2002 to 2018		
18.	SD10 General Election – 2002 to 2018		
19.	Election Analysis – H2100 – 2020 General		
20.	Election Analysis – H2316 – 2020 General		

Number	Name	Offered	Admitted
21.	Map Analysis – S2100		
22.	Citizen Voting Age Population Data – S2100		
23.	Map Analysis – S2168		
24.	Senate Population Deviation Map		
25.	Governor Abbott Proclamation – Third Called Session		
26.	U.S. Census Bureau Redistricting Data		
27.	Texas Senate Journal – Third Called Session		
28.	Texas House Journal – Third Called Session		
29.	Examples of the Senate Adopting Plans Offered by Democratic Senators		
30.	Senate Redistricting Committee Hearing Notices and Attachments		
31.	House Redistricting Committee Hearing Notice and Attachments		
32.	Cancelled House Redistricting Committee Hearings		
33.	Selected Images from the Summer 2021 Quorum Break		
34.	Expert Report and Declaration of Dr. John R. Alford		
35.	EI Voting Analysis – S2100 – 2012 to 2020		
36.	EI Voting Analysis – SD10 2014 Democratic Primary		

Number	Name	Offered	Admitted
37.	SD31 Electoral History – 2014 and 2018		
38.	HD90 Electoral History – 1996 to 2020		
39.	CD33 Electoral History – 2012 to 2020		
40.	<i>Texas Tribune</i> Article – Jan. 22, 2019		
41.	<i>Texas Tribune</i> Article – June 4, 2021		
42.	<i>Texas Tribune</i> Article – Sept. 21, 2021		
43.	<i>Texas Tribune</i> Article – Oct. 7, 2021		
44.	<i>Amarillo Pioneer</i> Article – Oct. 20, 2021		
45.	SD31 Analysis		
46.	SD9 Analysis		
47.	SD9 Electoral History		
48.	Texas Secretary of State – Election Advisory 2021-14		
49.	Texas Secretary of State – Election Advisory 2021-18		
50.	Texas Secretary of State – Election Advisory 2021-23		
51.	Texas Secretary of State – Important Election Dates		
52.	Declaration of Director of Elections Keith Ingram		

Number	Name	Offered	Admitted
53.	Declaration of County Judge David Blackburn		
54.	Declaration of Collin County Elections Administrator Bruce Sherbet		
55.	Declaration of Kendall County Elections Administrator Staci Decker		
56.	Transcript of Senate Redistricting Committee Hearing – Sept. 11, 2021		
57.	Video of Senate Redistricting Committee Hearing – Sept. 11, 2021		
58.	Transcript of Senate Redistricting Committee Hearing – Sept. 24, 2021		
59.	Video of Senate Redistricting Committee Hearing – Sept. 24, 2021		
60.	Transcript of Senate Redistricting Committee Hearing – Sept. 25, 2021		
61.	Video of Senate Redistricting Committee Hearing – Sept. 25, 2021		
62.	Transcript of Senate Redistricting Committee Hearing – Sept. 28, 2021		
63.	Video of Senate Redistricting Committee Hearing – Sept. 28, 2021		
64.	Transcript of Senate Floor Debate on SB4 – Oct. 4, 2022		
65.	Video of Senate Floor Debate on SB4 – Oct. 4, 2022		
66.	Transcript of House Redistricting Committee Hearing – Oct. 11, 2021		
67.	Video of House Redistricting Committee Hearing – Oct. 11, 2021		
68.	Transcript of House Floor Debate on SB4 – Oct. 15, 2021		

Number	Name	Offered	Admitted
69.	Video of House Floor Debate on SB4 – Oct. 15, 2021		
70.	Dr. John R. Alford Rebuttal Report		

Defendants reserve the right to use any and all of these exhibits, or those disclosed by the Brooks Plaintiffs, the right to use and offer into evidence exhibits for impeachment and rebuttal, if necessary, and the right to amend and/or supplement this exhibit list, including with exhibits disclosed during the course of third-party discovery.

Date: January 26, 2022

Respectfully submitted.

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/s/ Patrick K. Sweeten  
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**COUNSEL FOR DEFENDANTS**

#### **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 26, 2022, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten  
PATRICK K. SWEETEN